

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

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UNITED STATES OF AMERICA

v.

NO. 3:15-CR-247-L

YONNIE WU

FACTUAL RESUME

The defendant, Yonnie Wu, has reviewed with his attorney, Jeffrey Grass, and acknowledges that he understands in order to establish his guilt for Count One of the Information filed against him, namely: possession of a Schedule III controlled substances, to-wit: anabolic steroids, outside the usual course of professional medical practice and not for a legitimate medical purpose, in violation of 21 U.S.C. § 844, the government must prove each of the following elements beyond a reasonable doubt:

- First: That the defendant possessed a controlled substance for testing for University; and
- Second: That the defendant possessed the controlled substance knowingly and intentionally for testing for University's business.

Source: Third Circuit Pattern Jury Instructions, 6.21.844

Stipulated Facts

Between on or about October 2, 2013, and on or about May 13, 2015, the defendant, Yonnie Wu, knowingly and intentionally possessed a controlled substance, that is anabolic steroids, a Schedule III controlled substance.

More specifically, an individual, known as Michael Heryford sent samples of anabolic steroids to Scott Davis who then sent samples to Wu, for testing. These samples were sent by mail or Federal Express. On certain occasions, Heryford would send the samples directly to Wu. Mass Spec lab at Auburn University tested the samples of steroids for purity and quantity.

After Wu and mass spec lab teaching assistant, Mr. Wendell Grainger, completed the tests, the results of the tests were recorded in an electronic file, typically on a Microsoft PowerPoint presentation, which Wu sent to Davis who then deliver result back to Heryford. Wu edited test results and in a few occasion communicated with Heryford about the test results.

Wu made no money from testing; Auburn University received payments from Scott Davis for the testing.

This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support Wu's guilty plea to Count

One set forth in the Information.


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9/25/15
Date


YONNIE WU

Defendant


JEFFREY GRASS

Attorney for the Defendant

09/24/2015

Date

09/25/2015

Date